

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER
DISTRICT JUDGE

Debra Lee (surviving spouse of Robert Lee)

**AMENDED
NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF DEBRA LEE**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Debra Lee, as surviving spouse of Robert Lee, on **July 6, 2021 at 9:00 a.m. EDT**, and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Victoria J. Langton
Greenberg Traurig LLP
Terminus 200
3333 Piedmont Road NE
Suite 2500
Atlanta, GA 30305
(678) 553-7392
langtont@gtlaw.com

Date: July 1, 2021

Respectfully submitted,

s/ Victoria J. Langton

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*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2021 a correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff Debra Lee, as surviving spouse of Robert Lee, was originally served on the following Plaintiff's counsel by e-mail, with copies by email to Counsel for Defendants, on July 1, 2021:

Madeline Pendley, Esq. (counsel for Plaintiff, Robert Lee)
Lauren Massey, Esq. (counsel for Plaintiff, Robert Lee)
Sara Papantonio, Esq. (counsel for Plaintiff, Robert Lee)
Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)
Daniel A. Nigh, Esq. (via email)
Ruben Honik, Esq. (via email)
David Stanoch, Esq. (via email)
Conlee Whiteley, Esq. (via email)
Jessica Priselac, Esq. (via email)
Seth A. Goldberg, Esq. (via email)
Clem C. Trischler, Esq. (via email)
Sarah E. Johnston, Esq. (via email)

This 1st day of July, 2021.

s/ Victoria J. Langton
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